

AO 91 (Rev. 08/09) Criminal Complaint

SEALED

## UNITED STATES DISTRICT COURT

for the

Northern District of Indiana

- FILED -

JUN 11 2019

United States of America )

v. )

JUAN MANUEL FARIAS-CARDENAS )

Case No. 2:19-MJ-137 )

2:19-mj-00466-NJK )

Defendant(s)

At  
ROBERT N. TREGOVICH, Clerk  
U.S. DISTRICT COURT  
NORTHERN DISTRICT OF INDIANA

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 2018 through the present in the county of Lake in the  
Northern District of Indiana and elsewhere, the defendant(s) violated:

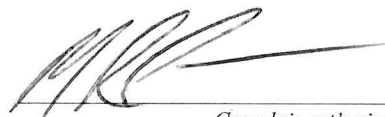
Code Section

Offense Description

21 U.S.C., Sections 846, 841(a)(1)  
& (b)(1)(A)(viii)Conspiracy to possess with the intent to distribute  
500 grams or more of a substance or mixture  
containing a detectable amount of methamphetamine.

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.

Complainant's signature

Mark Pulido, United States Postal Inspector

Printed name and title

Sworn to before me and signed in my presence.

Date: 06/11/2019

s/Andrew P. Rodovich

Judge's signature

City and state: Hammond, Indiana

MAGISTRATE JUDGE ANDREW P. RODOVICH

Printed name and title

COPY

**Affidavit in Support of an Arrest Warrant**

I, U.S. Postal Inspector Mark Pulido, being duly sworn upon my oath, depose and state as follows:

1. I am a United States Postal Inspector assigned to the Gary, Indiana domicile of the Detroit Division of the U.S. Postal Inspection Service (USPIS). I am sworn and empowered to investigate criminal activity involving or relating to the US Postal Service. I am currently assigned to a multi-functional team. As part of my job, I am responsible for investigating various federal crimes, including the trafficking of narcotics, mail theft, mail fraud, identity theft, violent crimes and dangerous mail investigations. I have been a postal inspector since April 2007. I have previously worked investigations involving the trafficking of controlled substances including marijuana, cocaine, methamphetamine, and heroin, in violation of Title 21 United States Code, Sections 841(a)(1), 843(b), and 846. I have also received additional narcotics training from the United States Postal Inspection Service and other law enforcement agencies. I am also currently assigned as a Task Force Officer to the Drug Enforcement Administration (DEA) Lake County Indiana High Intensity Drug Trafficking Area (HIDTA) group.

2. Furthermore, the statements included in this affidavit are based on my personal involvement in this investigation and information obtained from other agents, law enforcement officers, victims, and witnesses. Because this affidavit is being submitted for the limited purpose of securing a search warrant, I have not included each and every fact known to me concerning this investigation.

3. Through my training, education, and experience, I have become familiar with the manner in which illegal drugs are transported, stored, and distributed, and the methods of payment for such drugs. I have participated in numerous controlled deliveries and search warrants which have resulted in arrests and convictions. I have interviewed drug dealers, users, and confidential informants and have discussed with them the life-style, appearance, and habits of drug dealers and users. I know that drug traffickers typically use cell phones, computers, and other digital media to communicate about drug trafficking and to store information related to drug trafficking. Drug traffickers also use firearms to protect drugs and drug proceeds in their possession. Additionally, drug traffickers and money launderers conceal their properties and may keep books, records, receipts, notes, ledgers, or electronic data to help move their monetary currency and avoid law enforcement detection.

4. Regarding the transportation of drugs, I know that frequently drug traffickers maintain evidence of travel and other records required to arrange for the purchase and importation and distribution of such drugs, and keep tickets, notes, receipts, passports and other documents at their residence or the location where they conduct trafficking activities. I know that drug traffickers maintain records and other documents related to the possession, shipment, tracking and delivery of illegal controlled substances at the location where their trafficking activities occur. I know that indicia of occupancy, residency and ownership of premises, including but not limited to utility and telephone bills, cancelled envelopes, rental, purchase

or lease agreements, identification documents and keys are often maintained at such drugs trafficking locations.

5. Persons who traffic in drugs often maintain at their residences, and other locations where they conduct drug trafficking activities, unsold, or undistributed supplies of controlled substances and other drugs, drug paraphernalia including diluents, weighing and packaging items for the trafficking of controlled substances.

6. This Affidavit is made in support of the complaint for the arrest of Juan Manuel FARIAS-Cardenas for conspiracy to possess with the intent to distribute 500 grams or more of a substance or mixture containing a detectable amount of methamphetamine in the violation of Title 21, United States Code, Sections 846, 841(a)(1) & (b)(1)(A)(viii).

7. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for requested warrant and does not set forth all of my knowledge about this matter. I have set forth only the facts that I believe are necessary to establish probable cause to believe that Juan Manuel FARIAS-Cardenas conspired to possess with the intent to distribute 500 grams or more of a substance or mixture containing a detectable amount of methamphetamine in the violation of Title 21, United States Code, Sections 846, 841(a)(1)(A) & (b)(1)(A)(viii).



**Facts Supporting Probable Cause**

8. On April 9, 2019, a confidential source (hereinafter CS1) was arrested when a search warrant was executed at his/her place of business and methamphetamine was located. Following CS1's arrest, he/she agreed to cooperate with law enforcement agents and was signed up as DEA Confidential Source (CS) and assigned a DEA CS number. CS1 began providing information regarding his/her various sources of methamphetamine including the following:

9. CS1 stated he/she in the summer of 2018 met a female he/she knew as Maya (subsequently identified as Maya Garcia) at a local bar owned by an associate who was previously arrested during a controlled delivery. According to CS1, Garcia knew he/she sold methamphetamine and approached him/her and asked if he/she would like to be introduced to her associate who sold methamphetamine. CS1 accepted Garcia's offer and she subsequently introduced him/her to an individual he/she knows "Don Domingo" (later positively identified as Juan Manuel FARIAS-FARIAS) hereinafter referred to as FARIAS.

10. CS1 stated that starting in approximately August of 2018, he/she would routinely coordinate purchases of methamphetamine directly with FARIAS. CS1 stated he/she had purchased methamphetamine, usually between one and two pounds, on several occasions. During most of those occasions, FARIAS' associates would meet him/her in the Chicago area, or drop off the methamphetamine at his/her business. CS1 stated FARIAS did not speak English so he/she would use Google translator to send text messages or sometimes Garcia would translate on the

phone for them. FARIAS typically charged CS1 \$6,000 USC per pound of methamphetamine.

11. According to CS1, in February 2019, CS1 was supposed to purchase two pounds of methamphetamine from FARIAS. However, FARIAS contacted him/her and said there were problems and the sale would have to be postponed. Later that night, CS1 saw a news story on television regarding a traffic stop on Interstate 88 which resulted in a large seizure of methamphetamine.<sup>1</sup> CS1 subsequently learned from conversations with FARIAS that FARIAS was associated with the methamphetamine seized from the vehicle.

12. Several days later, CS1 and FARIAS once again initiated discussions regarding CS1 purchasing methamphetamine. According to CS1, FARIAS was wavering regarding having someone come to Chicago to deliver the methamphetamine due to the recent seizure. CS1 subsequently offered to come to FARIAS to purchase the methamphetamine and FARIAS accepted. CS1 was then sent a photograph of a piece of mail with the name covered with an address of “4408 Calhoun St, Gary, IN 46408-2914” (here after referred to as “Calhoun Street residence”) as to where CS1 was supposed to go.

13. CS1 was nervous regarding going to the address and subsequently asked Garcia, who was already with FARIAS, to meet him/her at the first exit off the highway. CS1 subsequently drove to Gary, Indiana and met Garcia and her boyfriend (subsequently identified as Denzel Davis) at the first exit off the highway.

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<sup>1</sup> To date, law enforcement have not been able to verify this seizure.

They then proceeded to the Calhoun Street residence. Upon arrival at the Calhoun Street residence Garcia and Davis went inside the residence for a short period of time and then came out and brought CS1 into Calhoun Street residence. CS1 stated Garcia, Davis, FARIAS, and an unidentified Hispanic male were inside the residence. Furthermore, CS1 stated he observed an AK-47 and AR-15 style rifle inside the Calhoun Street residence. FARIAS brought CS1 into a back bedroom of the where CS1 observed multiple one to two-gallon buckets covered by a sheet. FARIAS removed the sheet and CS1 observed approximately 20-30 buckets. FARIAS took a bucket and opened it in front of CS1. CS1 observed the bucket to contain approximately five individually wrapped one-pound bundles of methamphetamine. FARIAS removed four of the bundles and gave them to CS1. According to CS1, FARIAS customarily gives CS1 twice the amount of methamphetamines he/she is purchasing and CS1 provides payment for the additional methamphetamine at a later time.

14. In the end of April, 2017, CS1 began making a series of recorded telephone audio and text messaging conversations with FARIAS and Garcia. On or about April 29, 2019 at approximately 3:23 pm, CS1 was in telephonic voice communication with Garcia, who informed CS1 that FARIAS would be at Calhoun Street residence on May 3, 2019. These communications were been verified by toll records.

15. On or about May 1, 2019, at approximately 7:56 pm, CS1 received a text message from FARIAS stating "Amigo como estes maybe saturday ima be over

there ok". CS1 explained that this correspondence suggested that FARIAS would be at Calhoun Street Residence.

16. On May 3, 2019, CS1 was shown a previous booking photo for Juan Manuel FARIAS-Cardenas from a previous arrest. CS1 identified the individual in the photo as "Don Domingo." A search of a law enforcement database showed Juan M. FARIAS associated with the address 7936 Cherry River Drive, Las Vegas, NV 89145. On May 17, 2019, USPS records were reviewed and it was determined that individuals tracking the subject parcel were also tracking parcels going to 7936 Cherry River Drive, Las Vegas, NV 89145.

17. On or about May 4, 2019, at approximately 7:30 pm, CS1 contacted FARIAS. During this voice communication, FARIAS informed CS1, he would be traveling to the area on Tuesday, May 7, 2019 and would like to meet with CS1. CS1 explained that the intent of this meeting was for CS1 to purchase methamphetamine from FARIAS in Gary, IN.

18. On or about May 8, 2017, investigators working on this matter obtained an order from Magistrate Judge Joshua P. Kohler, Northern District of Indiana, for the cellular locator (herein after "geolocational ping") for the two telephones (Target Telephone #1 & #2) utilized respectively by FARIAS and Garcia. During the course of monitoring Target Telephone #1, the geolocational ping established occasions when Target Telephone #1 was located within 32 meters from the residence associated with FARIAS, 7936 Cherry River Drive, Las Vegas, NV 89145.



19. On May 14, 2019, CS1, spoke with FARIAS on the Target Telephone #1. During the conversation the two agreed to meet on Thursday, May 16, 2019. As previously discussed, CS1 and FARIAS agreed to CS1 purchasing one (1) pound of methamphetamine for \$6,000 and being fronted an additional four pounds of methamphetamine, with the understanding CS1 will repay the debt.

20. On or about May 15, 2019, between approximately 8:53am (PST) and 9:08 (PST), the order for the cellular locator provided the location for FARIAS's Target Telephone #1. FARIAS's Target Telephone #1 was located at 1180 W. Ball Road, Anaheim, CA 92812 which is a United States Postal Service (USPS) facility.

21. USPS records identified USPS Priority Express Mail EE479137162US addressed to Denzel Davis, 1068 Homer Ave. #1, Aurora, IL 60505 shipped from Anaheim, California, on May 15, 2019 at approximately 9:05am (PST) weighing approximately 8 pounds 6.2 ounces shipped from the post office located at 1180 W. Ball Road, Anaheim CA 92812

22. On May 15, 2019, CS1 had telephone communication with FARIAS. FARIAS informed CS1 that "it" was ready and the can meet on Thursday, May 16, 2019. CS-19-160251 and FARIAS ultimately agreed to meet on Friday, May 17, 2019, at FARIAS' house in Indiana, which CS1 knows to be the Calhoun Street residence.

23. On May 16, 2019, U.S. Postal Inspectors located the subject package at the Aurora, IL post office. The subject package had characteristics consistent with packages containing narcotics. A narcotics canine gave a positive alert on the

package and a search warrant was obtained for the package. Later that day, a federal search warrant for the package was executed on the subject package and it was found to contain 2,588.2 grams of a crystal-like substance that field tested presumptive positive for methamphetamine.

24. On May 17, 2019, agents obtained a photo of the mailer of the subject parcel from the USPS facility in Anaheim, CA. On May 17, 2019, the photo of the mailer was shown to CS1 to which CS1 identified the individual as the person he knew as “Don Domingo” (FARIAS).

25. On May 17, 2019, at approximately 10:10am, CS1 contacted FARIAS, who confirmed that he was in Chicago. FARIAS directed CS1 to reach out to Garcia. At approximately 10:11am, CS1 contacted Garcia her Target Telephone #2. During the conversation, CS1 asked Garcia if it would be ok to meet. Garcia explained that she was waiting on the Post Office, which she had just gotten off the phone with. Garcia advised “we” don’t know where it is. When asked if the package was being delivered to her in Aurora or to FARIAS, Garcia advised that it was supposed to be delivered yesterday. CS1 inquired if the package would contain “five” as that was the prearranged amount CS1 and FARIAS agreed to. Garcia replied “supposed to be, yeah.” Garcia informed CS1 that she would contact CS1 as soon as an update on the location of the package is determined.

26. On May 17, 2019, at approximately 11:13am, CS1 contacted FARIAS on his Target Telephone #1. During the conversation, FARIAS asked if the CS contacted Garcia. CS1 and Farias agreed to meet in two hours. At approximately

11:24 am, CS1 received a phone call from Garcia from Garcia's Target Telephone #2. During this conversation, CS1 inquired if everything was ok, at which time Garcia explained that she thought "it" was lost in the mail. Garcia went on to explain the package was supposed to be sent overnight "yesterday" (5/16/2019) and now "we" do not know where it's at. CS1 asked Garcia if she had a tracking number, to which Garcia explained that the tracking number shows that "it is in transit" from two days ago. CS1 asked if she was checking the tracking with her phone or the computer, to which Garcia offered the tracking number. At approximately 11:32am, CS1 received a multi-media text message from FARIAS' Target Telephone #1. This message contained a photo of a receipt with a highlighted USPS Tracking number of "EE479137162US." Further this receipt revealed that the package was shipped from a USPS Facility located at 1180 W. Ball Road, Anaheim, CA 92812 on May 15, 2019 with a time stamp of 9:10am.

27. On May 17, 2019, at approximately 12:22 pm, CS1 contacted FARIAS. CS1 asked FARIAS if the package was going to arrive "today," to which FARIAS replied "yes". The CS1 explained to FARIAS that CS1 would like to meet CS1 in person to discuss a method in which to "your stuff her much safer." CS1 further provided a toll-free phone number to USPS for Farias to call to inquire about the status of the lost package. After receiving the number, in broken English, FARIAS stated "In Anaheim." FARIAS went on to state "the name is Denzel, Denzel Davis."

28. On May 17, 2019, at approximately 12:48 pm, CS1 contacted Garcia. CS1 provided the same toll free number CS1 provided to FARIAS, to which Garcia stated that “we already did all of that, we already made a case on it.” CS1 asked what the issue was, to which Garcia stated that the package was stuck in California. CS1 explained that he needed to speak with FARIAS, Garcia then advised that she was currently in route to pick up FARIAS and then the two would be headed to Indiana. Garcia stated she would contact CS1 within 45 minutes and the three would meet soon. CS1 directed Garcia to meet him at Cabela’s in Hammond, IN.

29. Agents set up surveillance within the parking lot of Cabela’s, Hammond, IN. In addition, CS1 was outfitted with a device capable of recording and transmitting video and audio in real time. At approximately 2:23pm, FARIUS Target Telephone #1 had a geo-locational ping of I-94 and Sibley Blvd. At approximately 2:31pm Garcia’s Target Telephone #2 had a geolocational ping of I-94 and Wentworth Avenue. At approximately 2:39pm, agents observed a grey Mercury Mountaineer bearing IL passenger AU71137 entering and parking in the east parking lot of Cabela’s. Agents identified the driver as Garcia and the front seat passenger as FARIAS.

30. At 2:45pm, CS1 arrived at the parking lot. At 2:48pm, CS1 contacted Garcia and provided Garcia with CS1’ location. Garcia relocated her vehicle to where CS1’ vehicle was located and CS’s entered Garcia’s vehicle through the rear driver side passenger door. Upon entering Garcia’s vehicle, Garcia stated “it did not



come.” Garcia translated for Farias providing a possible day of Tuesday. CS1 explained to the two, that CS1 has a friend that drives to and from California and offered to introduce the friend to Garcia and FARIAS. Garcia enthusiastically agreed with this idea, stating “that’s what I told him (FARIAS).”

31. During the meeting agents monitored the video and audio feed from the equipment provided to CS1. The agent identified FARIAS as the same individual that had mailed the subject package on May 15, 2019 in Anaheim, California. Agents identified Garcia from a booking photo obtained from her May 16, 2005, arrest in Arizona. Garcia’s identity was also confirmed through her arrest on June 8, 2019, for violation of Title 21, United States Code, Sections 841(B)(1A) & (b)(1)(A)(viii), the possession with the intent to distribute 500 grams or more of a substance or mixture containing a detectable amount of methamphetamine.

32. On or about May 24, 2019, FARIAS called CS1 and told CS1 that FARIAS was in California. FARIAS went on to tell CS1 that FARIAS will need advanced payment to provide future product.

33. From June 3, 2019, through June 8, 2019, CS1 and Garcia had several telephone conversations and text communications regarding Garcia and Denzel Davis traveling to Georgia to obtain a large quantify of methamphetamine. During one of the conversations with CS1, Garcia told CS1 if he/she “remembered the first time when she and “Denzel” went to Georgia and “brought it back.” CS1 understood Garcia to be referring to another trip in Georgia that Garcia and Davis made to obtain a large quantity of methamphetamine in February 2019.

34. On June 8, 2019, Garcia and Denzel Davis were stopped for traffic violations on Interstate 80/94 near Indiana mile marker 3, by Porter County Sheriff's Deputy Tim Dernalc assisting in this investigation. Based on information received from Garcia's Target Telephone #2 and her communication with CS1, Garcia and Davis were traveling from Texas with a quantity of methamphetamine. As stated above, Garcia told CS1 that Garcia was traveling to Georgia. However, the cellular locator provided the location for Garcia's Target Telephone #2 established Garcia and Davis traveled to Texas to obtain the methamphetamine. Garcia apparently was unwilling to disclose to CS1 the true location where Garcia and Davis were obtaining the methamphetamine.

a. Upon the arrival of a canine unit, the canine handler conducted an exterior open air check on the vehicle and the dog alerted for the likely presence of narcotics. Subsequently, in excess of 4 kilograms of suspected methamphetamine and drug paraphernalia (a scale, plastic bags and vacuum sealer) were recovered from the rear of the SUV. Both Garcia and Davis were taken into custody for possession of methamphetamine and held by the Hammond Police Department for 48 hours on local charges. On June 10, 2019, this Court issued a complaint charging Garcia and Davis with possession with the intent to distribute 500 grams or more of a substance containing methamphetamine in violation of Title 21, United States Code, Sections 846, 841(a)(1) & (b)(1)(A)(viii).

35. Accordingly, I respectfully request that the court issue:

a. An arrest complaint and warrant for the arrest of Juan Manuel FARIAS-Cardenas for conspiracy to possess with the intent to distribute 500 grams or more of a substance or mixture containing a detectable amount of methamphetamine in the violation of Title 21, United States Code, Sections 846, 841(a)(1) & (b)(1)(A)(viii).

b. An order sealing the Arrest Warrant, Complaint and Affidavit.

FURTHER AFFIANT SAYETH NAUGHT

  
\_\_\_\_\_  
Mark Pulido  
U.S. Postal Inspector

Sworn and subscribed before me  
this 11th day of June, 2019:

**3/Andrew P. Rodovich**

\_\_\_\_\_  
HONORABLE ANDREW P. RODOVICH  
UNITED STATES MAGISTRATE JUDGE  
NORTHERN DISTRICT OF INDIANA

AO 442 (Rev. 01/09) Arrest Warrant

SEALED

## UNITED STATES DISTRICT COURT

for the  
Northern District of Indiana

United States of America

v.

JUAN MANUEL FARIAS-CARDENAS

*Defendant*

Case No. 2:19-MJ-137

2:19-mj-00466-NJK

## ARREST WARRANT

To: Any authorized law enforcement officer

**YOU ARE COMMANDED** to arrest and bring before a United States magistrate judge without unnecessary delay  
(name of person to be arrested) JUAN MANUEL FARIAS-CARDENAS,  
who is accused of an offense or violation based on the following document filed with the court:

- ☐ Indictment      ☐ Superseding Indictment      ☐ Information      ☐ Superseding Information      ☒ Complaint  
☐ Probation Violation Petition      ☐ Supervised Release Violation Petition      ☐ Violation Notice      ☐ Order of the Court

This offense is briefly described as follows:

Charging JUAN MANUEL FARIAS-CARDENAS with conspiracy to possess with the intent to distribute  
500 grams or more of a substance or mixture containing a detectable amount of methamphetamine.  
Violation of 21 U.S.C., Sections 846, 841(a)(1) & (b)(1)(A)(viii).

Date: 06/11/2019/s/ Andrew P. Rodovich*Issuing officer's signature*City and state: Hammond, IndianaMAGISTRATE JUDGE ANDREW P. RODOVICH*Printed name and title*

## Return

This warrant was received on (date) \_\_\_\_\_, and the person was arrested on (date) \_\_\_\_\_  
at (city and state) \_\_\_\_\_.

Date: \_\_\_\_\_

*Arresting officer's signature**Printed name and title*

COPY